

1 Vaughn A. Crawford (NV Bar No. 7665)
2 SNELL & WILMER L.L.P.
3 One Arizona Center
4 400 East Van Buren Street, Suite 1900
5 Phoenix, AZ 85004-2202
6 Telephone: 602-382-6000
7 vcrawford@swlaw.com

8 Joshua D. Cools (NV Bar No. 11941)
9 SNELL & WILMER L.L.P.
10 3883 Howard Hughes Parkway, Suite 1100
11 Las Vegas, NV 89169-5958
12 Telephone: 702-784-5200
Facsimile: 702-784-5252
jcools@swlaw.com

13 Christopher P. Norton (SBN 234621) (*Pro Hac Vice pending*)
14 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C.
15 2029 Century Park East, Suite 3100
16 Los Angeles, CA 90067
Telephone: 310-586-3200
Facsimile: 310-586-3202
cpnorton@mintz.com

17 *Attorneys for Defendants*
18 *Stryker Corporation and Stryker Sales Corporation*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 RYAN Q. CLARIDGE,

22 Plaintiff,

23 vs.
24 I-FLOW CORPORATION, a Delaware corporation;
I-FLOW, LLC, a Delaware limited liability company;
DJO LLC (f.k.a. DJ ORTHOPEDICS, LLC), a Delaware limited liability company;
DJO, INCORPORATED, aka DJO, INC., a Delaware corporation;
STRYKER CORPORATION, a Michigan corporation; and
STRYKER SALES CORPORATION, a Michigan corporation,

25 Defendants.

CASE NO.: 2:18-cv-01654-GMN-PAL

26 **STIPULATION AND ORDER TO
EXTEND THE DUE DATE FOR THE
OPPOSITION AND REPLY BRIEFS
PERTAINING TO DEFENDANTS'
MOTION TO DISMISS AND STRIKE
PORTIONS OF THE COMPLAINT**

27 **(FIRST REQUEST)**

28 Complaint Filed: August 30, 2018

Given the holiday season and the schedules of counsel for all involved, the parties submit the following Stipulation to extend the deadlines for the current briefing schedule. Specifically, the parties have stipulated to allow Plaintiff Ryan Q. Claridge ("Plaintiff") and Defendants

1 Stryker Corporation, Stryker Sales Corporation, And I-Flow, LLC (“Defendants”) additional time
2 from the current opposition deadline of December 21, 2018 for Plaintiff to respond to
3 Defendants’ Motions to Dismiss and Strike Portions of Complaint [Dkt. Nos. 16 and 19 filed on
4 December 7, 2018] (“Motions”) and additional time from the current reply deadline of December
5 28, 2018 for Defendants to respond to Plaintiff’s opposition. Pursuant to the agreement of the
6 parties, Plaintiff shall have until January 14, 2019 to file an opposition to the Motions and
7 Defendants shall have until January 25, 2019 to file a reply to Plaintiff’s opposition. The Parties
8 also request that their Rule 26 obligations be stayed until the briefing is complete with respect to
9 the above.

10 This is the parties’ first request for an extension of the current briefing schedule.

11 DATED this 19th day of December, 2018.

12 By: /s/ Corey M. Eschweiler
Corey M. Eschweiler (NV Bar 6635)
GLEN LERNER INJURY ATTORNEYS
4795 South Durango Drive
Las Vegas, Nevada 89147

15 Colin P. King (UT Bar 1815)
DEWSNUP, KING, OLSEN, WOREL,
HAVAS, MORTENSEN
36 South State Street, Suite 2400
Salt Lake City, UT 84111

18 Attorney for Plaintiff
Ryan Q. Claridge

20 By: /s/ Jill P. Northway
Kevin A. Brown (NV Bar 7621)
Jill P. Northway (NV Bar 9470)
BROWN, BONN & FRIEDMAN, LLP
5528 S. Fort Apache Rd.
Las Vegas, NV 89135

23 Attorneys for Defendant
I-Flow, LLC

13 By: /s/ Vaughn A. Crawford
Vaughn A. Crawford (NV Bar 7665)
Joshua D. Cools (NV Bar 11941)
SHELL & WILMER
3883 Howard Hughes Parkway, #1100
Las Vegas, NV 89169-5958

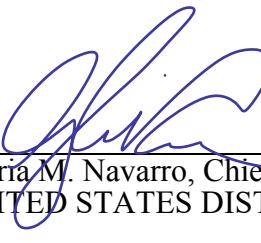
15 Christopher P. Norton (CA Bar 234621)
(*Pro Hac Vice pending*)
MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.
2029 Century Park East, Suite 3100
Los Angeles, CA 90067

18 Attorneys for Defendants Stryker
Corporation and Stryker Sales
Corporation

25 **ORDER**

26 IT IS SO ORDERED.

27 DATED this 21 day of December, 2018.

28 
Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND THE DUE DATE FOR THE OPPOSITION AND REPLY BRIEFS PERTAINING TO DEFENDANTS' MOTION TO DISMISS AND STRIKE PORTIONS OF THE COMPLAINT (FIRST REQUEST)** by the method indicated below and addressed as follows:

- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Corey M. Eschweiler, Esq. (SBN 6635)
GLEN LERNER INJURY ATTORNEYS
4795 South Durango Drive
Las Vegas, Nevada 89147
Telephone: (702) 877-1500
Facsimile: (702) 933-7043
ceschweiler@glenlerner.com
Attorneys for Plaintiff

Colin P. King (UT Bar No. 1815)
(Admitted Pro Hac Vice)
DEWSNUP KING OLSEN WOREL HAVAS
MORTENSEN
36 South State Street, Suite 2400
Salt Lake City, UT 84111
Telephone: (801) 533-0400
cking@dkowlaw.com
Attorneys for Plaintiff

Kevin A. Brown, Esq. (SBN 7621)
Jill P. Northway, Esq. (SBN 9470)
Brown, Bonn & Friedman, LLP
5528 S. Fort Apache Road
Las Vegas, NV 89135
Telephone: (702) 942-3900
Facsimile: (702) 942-3901
jnorthway@brownbonn.com
*Attorneys for Defendant
I-Flow, LLC*

/s/ Julia M. Diaz
An Employee of SNELL & WILMER L.L.P.